

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LAYNE DREXEL,	:	
	:	
Plaintiff,	:	
	:	C.A. No. 05-00428 (JJF)
v.	:	
	:	Jury Trial Demanded
HARLEYSVILLE INSURANCE CO.,	:	
	:	
Defendant.	:	

Plaintiff's Local Rule 51.1(c) Proposed Special Verdict Form

1. Do you find that Layne Drexel and Harleysville Mutual Insurance Company entered into an insurance contract covering the dates June 8, 2004 and June 3, 2005?

☐ Yes ☐ No

* If your answer is "Yes," please proceed to question 3. If your answer is "No," please proceed to question 2.

2. Do you find that Harleysville, because of its actions following the fire, should be estopped from denying the existence of an insurance policy which was effective on the date of the fire?

☐ Yes ☐ No

* If your answer is "Yes," please proceed to question 3. If your answer is "No," please proceed to question 5.

3. Do you find that Harleysville Mutual Insurance Company has breached the insurance contract with Layne Drexel?

☐ Yes ☐ No

* If your answer is "Yes," please proceed to question 4. If your answer is "No," please proceed to question 5.

4. What amount of compensatory damages to you determine Layne Drexel is entitled to based on Harleysville Mutual Insurance Company's breach of the contract?

\$_____.

* Proceed to question 7.

5. Do you find that Harleysville should compensate plaintiff for the fire damages under the doctrine of Promissory Estoppel?

____ Yes ____ No

*If your answer is "Yes," please proceed to question 6. If your answer in "No," please stop and notify the bailiff that you are finished.

6. What amount of compensatory damages to you determine Layne Drexel is entitled to under the doctrine of Promissory Estoppel?

\$_____.

* Stop. Notify the bailiff that your are finished.

7. Do you find that Harleysville Mutual Insurance Company acted in bad faith when it breached the insurance contract with Layne Drexel?

____ Yes ____ No

* If your answer is "Yes," please proceed to question 8. If your answer is "No," notify the bailiff that you are finished.

8. What amount of punitive damages do you award for Harleysville Mutual Insurance Company's bad faith breach of contract?

\$_____.

* Stop. Notify the bailiff that you are finished.

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